

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVEN CHASE,

Defendant.

DOCKET NO. 5:15 CR 15-1

UNOPPOSED MOTION TO CONTINUE TRIAL DATE

Steven Chase, by and through his counsel of record, Assistant Federal Defender Peter Adolf, respectfully requests that this Court continue the trial date presently scheduled for September 8, 2015 at 10:00 AM. As grounds therefore, it is averred:

1. The arraignment order was issued in this case on April 16, 2015, and shortly thereafter the case was continued to the July calendar pursuant to 18 U.S.C. § 3161(c)(2). This Court then continued the case to the present date *sua sponte* pursuant, *inter alia*, to 18 U.S.C. § 3161(h)(7) after continuing the codefendant's case.

2. Mr. Chase and his codefendant are charged with engaging in a "child exploitation conspiracy" and related predicate charges; specifically, they are accused of operating a website on which users exchanged child pornography. If convicted, they each face a mandatory minimum of twenty years in prison (and a maximum of life in prison) on count one alone. The codefendant faces a mandatory minimum of twenty-five years in prison if convicted on either count two or count three.

3. The government has informed the defense, in response to a discovery request, that forensic testing on the computers and other electronic devices seized from Mr. Chase's residence has not yet been completed, but that the results of such testing are expected soon. However, those results are not expected in time for the defense to digest such information and prepare for trial during the upcoming trial calendar. In the meantime, the parties have arranged for the defense to review the currently available evidence at the local FBI field office this afternoon.

4. The defense is in the process of retaining an information technology expert with expertise relevant to the instant case who the defense expects to call as a witness at trial. However, the defense has been unable to locate such an expert who would be available to testify during the upcoming trial calendar.

5. The United States does not oppose this motion.

WHEREFORE, Steven Chase respectfully requests a continuance of his trial date.

Respectfully submitted:

s/ Peter Adolf
Peter Adolf
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DATE: August 20, 2015

CERTIFICATE OF SERVICE

I, Peter Adolf, Assistant Federal Defender, hereby certify that I have served a copy of the attached Unopposed Motion to Continue Trial Date upon the following via electronic filing:

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Respectfully submitted:

s/ Peter Adolf
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